

Connecticut Department of Consumer Protection
Drug Control Division
Prescription Monitoring Program

Police Department Drop Boxes
Collection and Proper Disposal of Unwanted and
Expired Medications

September 1, 2011



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Attachments:	
• Attachment A –Application for Prescription Drop Box to DCP Prescription Monitoring Program	
• Attachment B -Letter to DEA requesting authorization to install a Prescription Drop Box	

***For more information on the policy and procedures, please contact:

*Gerald Destefano, Principal Agent,
Drug Control Division,
Department of Consumer Protection,
Gerald.destefano@ct.gov
860-713-6067*

Or

For more information about medication drop boxes and related supplies, please contact:
Your Regional Action Council (RAC). To locate your RAC, please go to
<http://www.ctprevention.org/> and use the “Find Your Regional Action Council” (on right hand
side of the web page)

Medication Collection/Disposal Program Policy and Procedures:

POLICY

1. The medication collection and disposal program provides a safe disposal location for citizens to properly dispose of unused household medications.
 - a. This program provides an environmentally safe alternative to disposing of medications in the landfill or sewer systems that may later negatively affect the environment.
 - b. This program encourages citizens to remove their unneeded medications from their homes. This reduces access to addictive medications for accidental or intentional misuse by children or others in the home.
 - c. Commercial disposal from medical facilities, doctor/dental offices, veterinarians, etc. is prohibited and is not part of this program.
 - d. The material to be disposed must be destroyed in accordance with police department policies and must include incineration as the method of destruction. The incineration must be performed in an authorized facility designated to perform the destruction of controlled substances.

PROCEDURES

#1: Seeking Authorization to install a pharmaceutical collection drop box

The Chief of Police, or his Department Delegate, will perform the following:

- a. Contact The Department of Consumer Protection for an application to receive a registration. The registration is fee exempt and renewed on a yearly basis. This registration will be used for verification, compliance and verification for the Drug Enforcement Administration. Failure to obtain said registration will result in non compliance. A copy of the application is provided. **See attachment A.** The Department issued credential number should be conspicuously displayed on the Drop Box.
 - (a) Gerald Destefano, Principal Drug Control Agent 860-713-6065
- b. Contact The Drug Enforcement Administration for an authorization letter. A template letter is provided. **See attachment B.** Also, please contact :
 - (b) Leonard Levin, DEA Group Supervisor for Connecticut at 860-257-2601.
 - (c) **A copy of the signed DEA authorization must be forwarded to the Department of Consumer Protection along with the completed application.**

#2: Purchase and installation of the pharmaceutical collection drop box

The Police Department will obtain an approved steel one-way hopper door type collection box to be secured in its lobby into which citizens may deposit these medications. Under no circumstances will the drop box be located outside of the Police Department lobby.

- a. The collection box shall be clearly marked for this purpose with instructions for proper use.
- b. The collection box shall be double locked and securely fastened in place to prohibit removal of the box or retrieval of medications from within the box by unauthorized persons.
- c. Citizens may place their unused medications/drugs into the collection box anonymously. Markers will be provided to encourage depositors to obliterate personally identifying information.
- d. Opened containers of liquid will not be accepted unless they are completely sealed.
- e. Syringes shall not be placed into the drop box. Signage will instruct depositors of alternative methods of disposal.
- f. No medications or other waste shall be permitted to be left outside of the drop box.

#3: Collection and monitoring of the medication disposals

The evidence clerk or designated officer will hold one of two keys to the collection box. The other key will be held by another designated full time certified police officer.

- i. No evidence clerk or officer shall have individual access to the contents of the collection box.
 - i. Staff may monitor the collection of the drop box contents. This allows the ability to survey the kinds of medications that are being disposed of. This information can be used for evaluation and decisions regarding this pilot program.
 - ii. A case number will be assigned to the collection box as per department policy. The evidence clerk or designated officer will have to provide a total weight collected annually. This allows for tracking of data to monitor the programs benefits.
 - iii. The deposited drugs will be collected on a frequency deemed necessary based on usage. The viewports on the collection box should be checked weekly, unless an especially large deposit is observed.
 - iv. The individual retrieving the box or bucket shall wear protective gloves. The box or bucket shall be closed with a lid and sealed with evidence tape. A numbered tag shall be applied.
 - v. The chain of custody shall be documented from retrieval through destruction. Access to the box shall be logged, including date, time, case number, tag number, and individuals involved.

#4: Storage and disposal of the collected medications

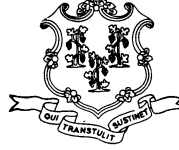
- i. The evidence clerk or designated officer will package the deposited drugs, document a general description of the contents, provide a weight of the contents, and place into evidence as abandoned property pending destruction through witnessed incineration. The material located in the drop box should not be handled nor is individual product identification required.
- ii. The evidence clerk or designated officer shall ensure the destruction of the collected medications by witnessed incineration at intervals not to exceed six months.

#5: Annual Registration renewal with Connecticut Department of Consumer Protection

A registration will be obtained from the Department of Consumer Protection, Drug Control Division web site. This registration is non-fee and will be renewed yearly. A new registration number will be issued with each renewal. On a yearly basis during the registration renewal process, the accumulated yearly weight will be submitted to the Drug Control Division, Department of Consumer Protection.

**STATE OF CONNECTICUT
DEPARTMENT OF CONSUMER PROTECTION**

Drug Control Division
Telephone: (860) 713-6065
Web Site: www.ct.gov/dcp



For Official Use Only

**PLEASE COMPLETE THIS APPLICATION FOR A PRESCRIPTION
DRUG DROP BOX LOCATED WITHIN A POLICE DEPARTMENT**

NOTE: This registration will expire annually on January 31st of each year and need to be renewed online.

**Completed applications will ONLY be
accepted by the following methods:**

- 1. Email: Drug.Control@ct.gov**
- 2. Fax: (860) 713-7242**

*****Along with this application please submit
A copy of the authorization letter from the Drug
Enforcement Agency (DEA)*****

*Please note that there is no fee associated with this application

Police Department Name			
Street Address	City	State	Zip Code
Department Telephone Number (with area code)	Department Email Address		
Primary Contact at the Police Department	Primary Contact Phone Number (with area code)		
Primary Contact Email Address			
Anticipated Start Date	Box Specifications (May be attached)		
Destruction Facility Name		Destruction Facility Phone Number (with area code)	
Destruction Facility Street Address	City	State	Zip Code

☐ **By checking this box I am confirming that I have read the instructions provided by the Department of Consumer Protection, Drug Control Division for implementing and maintaining a Prescription Drug Drop Box.**

Name: _____ Date: _____
(Person completing this form)

{Police Department Letterhead}

{Date}

Sent Certified Mail XXXX XXXX XXXX XXXX XXXX

John J. Arvanitis
Special Agent in Charge
Drug Enforcement Administration
New England Field Division
JFK Federal Building
15 New Sudbury Street, Room E-400
Boston, MA 02203-0402

Dear Mr. Arvanitis,

As set forth in 21 CFR 1307.21, this letter is to request from you authorization to install a pharmaceutical collection “drop box” in the lobby of our police station located at { address }
In the {town/city} of {name of town/city}. The purpose of this drop box program is to create a convenient and secure location for residents to discard their unneeded household pharmaceuticals.
This ensures that these medications, some of which may be controlled substances, are transferred from the individual prescribed directly into the police evidence collection process as abandoned property, preventing their possible diversion to unauthorized persons. Additionally, this process prevents possible harm to the environment should these substances be flushed down the drain or simply tossed in the trash. The drop box provides a sealed, self-contained system for collecting these substances in a pharmaceutical container that safeguards against spillage. The collection drop box is especially designed for this purpose and is constructed of 16 gauge steel with a one-way hopper style door. It will be securely fastened in place in the police station lobby. Items deposited in the drop box are non-recoverable by the depositor. The contents of the box are able to be monitored through a view port on the outside of the collection box. Two separate keys are required to access the box to remove the collection container. When the collection container is filled a designated officer or evidence clerk, with a second certified full time police officer, will apply a lid to the container and place it into evidence as abandoned property following the department’s usual procedures. The collected medications will then be periodically destroyed through witnessed incineration.
We have developed policies and procedures based on those already in practice for the handling of police evidence and controlled substances, and have attached them for your review as well as a copy of the State of Connecticut, Department of Consumer Protection, Drop Box Registration. We hope that you will find them satisfactory and approve our request to implement this important public service.

Sincerely,

XXXXXX
XXXXXX

CC:
John Gadea, Jr, Director
Drug Control Division
Department of Consumer Protection